

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

Tyhe McClendon and Kianna Lee,)	
)	
Plaintiffs,)	
)	
vs.)	CIVIL ACTION FILE NO:
)	
Deere & Company and John/Jane Does)	_____
1-20, inclusive)	
)	
Defendants.)	
_____)	

DEFENDANT’S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, Defendant Deere & Company (“Deere”) hereby files this Notice of Removal of the above-styled case, and shows this Court as follows:

1. Plaintiffs Tyhe McClendon and Kianna Lee filed a lawsuit against Deere on or about May 6, 2022 in the State Court of Fulton County, styled *Tyhe McClendon and Kianna Lee v. Deere & Company, and John/Jane Does 1-20, inclusive*, Case No. 22-EV-002711. Plaintiffs effectuated service on Deere on June 23, 2022. Pursuant to 28 U.S.C. § 1446(a), true and correct copies of all process, pleadings, and orders filed in the State Court of Fulton County, Georgia, as of the date of the filing of this Notice of Removal are attached as Exhibit “A.”

2. The Complaint purports to state a product liability claim against Deere, seeking to recover for injuries to Plaintiff McClendon's right leg, intestines and penis, and for Plaintiff Lee's loss of love, affection, companionship, comfort, society and relations with Plaintiff McClendon.

3. Removal of this case is appropriate based on diversity jurisdiction pursuant to 28 U.S.C. §1332 and 28 § U.S.C. 1441, as the district court has original jurisdiction based on the fact that Plaintiffs allege the amount in controversy exceeds \$75,000, exclusive of interests and costs, and is between citizens of different states.

Complete Diversity of Citizenship Exists

4. There exists a complete diversity of citizenship between Plaintiffs and Deere, both at the time of the filing of the Complaint and as of the date hereof. Currently, Plaintiffs and Deere are the only parties to this action.

5. Upon information and belief, Plaintiffs are citizens and residents of Georgia.

6. Deere is a corporation incorporated in Delaware and has its principal place of business in Moline, Illinois.

7. Therefore, complete diversity of citizenship exists between the parties to this lawsuit for purposes of establishing diversity jurisdiction under 28 U.S.C. §

1332(a).

The Amount in Controversy Exceeds \$75,000

8. The Complaint is silent on the amount in controversy; however, the Complaint alleges that Plaintiff McClendon suffered catastrophic injuries, including but not limited, to his right leg, intestines and penis. Plaintiff McClendon seeks recovery for his past and future medical expenses, past and future pain and suffering, and lost earnings. Complaint, ¶¶ 18-24. Further, Plaintiff Lee seeks to recover for the lost “love, affection, companionship, comfort, society, and relations with Plaintiff McClendon.” *Id.* at 7

9. Consequently, the combined amount in controversy in this matter exceeds \$75,000.00 for purposes of establishing diversity jurisdiction under 28 U.S.C. § 1332(a).

Removal is Timely

10. The removal of this case is timely pursuant to 28 U.S.C. § 1446(b) as Deere was served with the Complaint on June 23, 2022, and this filing is within 30 days of service of the Complaint on Deere.

11. Removal of this matter to the U.S. District Court, Northern District of Georgia, Atlanta Division, is appropriate pursuant to 28 U.S.C. § 1446(a), as the removed case was brought in Fulton County, Georgia by the Plaintiffs.

12. In filing this Notice of Removal, Deere does not waive, and specifically reserves, any and all defenses, exceptions, rights, and motions. No statement or omission in this Notice of Removal shall be deemed an admission of any allegations leveled or damages sought in the Complaint.

13. Contemporaneous with the filing of this Notice of Removal, Deere will provide written notice of the filing to Plaintiffs and will file a copy of this Notice of Removal with the Clerk of the State Court of Fulton County, Georgia. A copy of this Notice of Filing Notice of Removal is attached hereto as Exhibit “B.”

14. Deere will tender the appropriate fees and costs for removal and docketing of this matter in federal court contemporaneously with this Notice of Removal.

By this Notice of Removal, Deere does not waive any objections it may have as to service, venue, jurisdiction, and/or the allegations made in the Complaint, and otherwise preserves all defenses to this action. Any admissions of fact or law contained herein are made solely for purposes of this Notice, and Deere expressly reserves the right to object to usage of said admissions in future pleadings, motions, and/or argument by Plaintiffs.

WHEREFORE, this Court has jurisdiction over this action and may issue any such orders or process as may be necessary to bring all necessary parties

before this Court.

Respectfully submitted this 21st day of July, 2022.

WEINBERG, WHEELER, HUDGINS,
GUNN & DIAL, LLC

/s/ Carol P. Michel

Carol P. Michel
Georgia Bar No. 504056
Shubhra R. Mashelkar
Georgia Bar No. 475388
*Counsel for Defendant Deere &
Company*

3344 Peachtree Road, N.E., Suite
2400
Atlanta, GA 30326
Telephone: (404) 876-2700
Facsimile: (404) 875-9433
cmichel@wwhgd.com
smashelkar@wwhgd.com

CERTIFICATE OF COMPLIANCE WITH LOCAL RULES 5.1 AND 7.1D

Pursuant to Local Rules 5.1 and 7.1D of the United States District Court of the Northern District of Georgia, the undersigned certifies that the foregoing submission to the Court was computer-processed, prepared with a top margin of not less than one and one-half inches and a left margin of not less than one inch, double-spaced between lines, and used Times New Roman font of 14-point size.

Dated: July 21, 2022.

/s/ Carol P. Michel
Carol P. Michel

CERTIFICATE OF SERVICE

This is to certify that I have served a copy of **DEERE & COMPANY'S**
NOTICE OF REMOVAL on the opposing party in the foregoing matter via U.S.

Mail, postage prepaid, to wit:

Ramin Kermani-Nejad
Hani Ganji
Kermani Firm, LLC
1718 Peachtree St NW
Suite 489
Atlanta, GA 30309
Counsel for Plaintiffs

This 21st day of July, 2022.

WEINBERG, WHEELER, HUDGINS,
GUNN & DIAL, LLC

/s/ Carol P. Michel

Carol P. Michel
Georgia Bar No. 504056
Shubhra R. Mashelkar
Georgia Bar No. 475388
*Counsel for Defendant Deere &
Company*

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EXHIBIT A

General Civil and Domestic Relations Case Filing Information Form

☐ Superior or ☒ State Court of Fulton County

For Clerk Use Only

Date Filed

MM-DD-YYYY

Case Number

Plaintiff(s)

MCCLENDON TYHE

Last	First	Middle I.	Suffix	Prefix
LEE	KIANNA			

Last	First	Middle I.	Suffix	Prefix

Last	First	Middle I.	Suffix	Prefix

Last	First	Middle I.	Suffix	Prefix

Plaintiff's Attorney Ramin Kermani-Nejad

Defendant(s)

DEERE & COMPANY

Last	First	Middle I.	Suffix	Prefix
JOHN/JANE	DOES	1-20		

Last	First	Middle I.	Suffix	Prefix

Last	First	Middle I.	Suffix	Prefix

Last	First	Middle I.	Suffix	Prefix

Bar Number 669698Self-Represented ☐

Check One Case Type in One Box

General Civil Cases

- ☐ Automobile Tort
☐ Civil Appeal
☐ Contract
☐ Garnishment
☐ General Tort
☐ Habeas Corpus
☐ Injunction/Mandamus/Other Writ
☐ Landlord/Tenant
☐ Medical Malpractice Tort
☒ Product Liability Tort
☐ Real Property
☐ Restraining Petition
☐ Other General Civil

Domestic Relations Cases

- ☐ Adoption
☐ Dissolution/Divorce/Separate Maintenance
☐ Family Violence Petition
☐ Paternity/Legitimation
☐ Support – IV-D
☐ Support – Private (non-IV-D)
☐ Other Domestic Relations

Post-Judgment – Check One Case Type

- ☐ Contempt
☐ Non-payment of child support, medical support, or alimony
☐ Modification
☐ Other/Administrative

- ☐ Check if the action is related to another action(s) pending or previously pending in this court involving some or all of the same parties, subject matter, or factual issues. If so, provide a case number for each.

Case Number

Case Number

- ☒ I hereby certify that the documents in this filing, including attachments and exhibits, satisfy the requirements for redaction of personal or confidential information in O.C.G.A. § 9-11-7.1.

- ☐ Is an interpreter needed in this case? If so, provide the language(s) required. Language(s) Required

- ☐ Do you or your client need any disability accommodations? If so, please describe the accommodation request.

GEORGIA, FULTON COUNTY

DO NOT WRITE IN THIS SPACE

STATE COURT OF FULTON COUNTY

Civil Division

CIVIL ACTION FILE #: _____

TYHE MCCLENDON, and

KIANNA LEE,

1718 Peachtree Street NW, Suite 489 Atlanta,

Plaintiff's Name, Address, City, State, Zip Code Georgia 30309

vs.

DEERE & COMPANY, and John/Jane

DOES 1-20, inclusive, 106 Colony Park

800-B CUMMING GA 30040

TYPE OF SUIT	AMOUNT OF SUIT
<input type="checkbox"/> ACCOUNT	PRINCIPAL \$ _____
<input type="checkbox"/> CONTRACT	
<input type="checkbox"/> NOTE	INTEREST \$ _____
<input type="checkbox"/> TORT	
<input type="checkbox"/> PERSONAL INJURY	ATTY. FEES \$ _____
<input type="checkbox"/> FOREIGN JUDGMENT	
<input type="checkbox"/> TROVER	COURT COST \$ _____
<input type="checkbox"/> SPECIAL LIEN	

<input type="checkbox"/> NEW FILING	
<input type="checkbox"/> RE-FILING: PREVIOUS CASE NO. _____	

SUMMONSDefendant's Name, Address, City, State, Zip Code
TO THE ABOVE NAMED DEFENDANT:

You are hereby required to file with the Clerk of said court and to serve a copy on the Plaintiff's Attorney, or on Plaintiff if no Attorney, to-wit:

Name: Ramin Kermani-Nejad

Address: 1718 Peachtree Street NW, Suite 489

City, State, Zip Code: Atlanta, GA 30309

Phone No.: (678) 202-0494

An answer to this complaint, which is herewith served upon you, must be filed within thirty (30) days after service, not counting the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint, plus cost of this action. **DEFENSES MAY BE MADE & JURY TRIAL DEMANDED**, via electronic filing or, if desired, at the e-filing public access terminal in the Self-Help Center at 185 Central Ave., S.W., Ground Floor, Room TG300, Atlanta, GA 30303.

Christopher G. Scott, Chief Clerk (electronic signature)

SERVICE INFORMATION:

Served, this _____ day of _____, 20_____

DEPUTY MARSHAL, STATE COURT OF FULTON COUNTY

WRITE VERDICT HERE:

We, the jury, find for _____

This _____ day of _____, 20_____ Foreperson

(STAPLE TO FRONT OF COMPLAINT)

**IN THE STATE COURT OF FULTON COUNTY
STATE OF GEORGIA**

TYHE MCCLENDON, and
KIANNA LEE,

Plaintiffs,

v.

DEERE & COMPANY, and JOHN/JANE
DOES 1-20, inclusive

Defendants.

Civil Action File No.

Jury Trial Demanded

COMPLAINT FOR DAMAGES

COMES NOW, Plaintiffs in the above-styled action and shows the Court the following:

Parties, Jurisdiction, and Venue

1.

Plaintiffs, THYE MCCLENDON and KIANNA LEE ("Plaintiffs") are residents of State of Georgia, and subject to the jurisdiction of this Court. Plaintiffs are, and at all relevant times have been, married.

2.

Defendant DEERE & COMPANY does systematic business in the Fulton County, and may be served with a copy of the Summons and Complaint by serving the following registered agent for service of process: The Corporation Company, 106 Colony Park Drive, Suite 800-B, Cumming, GA 30040.

3.

Defendants John/Jane Doe(s) 1-20 are those yet unidentified individuals who may be liable in whole or in part for the damages alleged herein. Once served with process, John/Jane Doe(s) are subject to the jurisdiction and venue of this Court. Any reference to "Defendants" herein includes John/Jane Does 1-20.

4.

Jurisdiction and venue is proper as to all Defendants in this Court.

5.

Subject matter jurisdiction is proper in the Court as to all Defendants.

Background

6.

On February 4, 2021, in the State of Georgia, Plaintiff MCCLENDON was operating a defective tractor (model 544) designed, manufactured, marketed and distributed by Defendants. The tractor malfunctioned and catastrophically injured Plaintiff MCCLENDON, including but not limited to a severed right leg, intestines, and penis.

7.

As a result of Defendants' misconduct, Plaintiff LEE has lost the love, affection, companionship, comfort, society, and relations with Plaintiff MCCLENDON.

Count 1 – Strict Liability

8.

Plaintiffs reallege and incorporate the above allegations as if fully restated herein.

9.

Defendants are in the business of designing, manufacturing, marketing, and distributing tractors, including the subject tractor.

10.

Under OCGA §51-1-11 and other applicable case law, Defendants are strictly liable to Plaintiffs for the design and/or manufacturing defects in the subject tractor because the tractor was not merchantable or reasonably suited for its intended use when it was sold as new, and its defective condition when sold was the proximate cause of Plaintiffs' injuries.

11.

Defendants are strictly liable to Plaintiffs for the design defects in the tractor because the risks inherent in the tractor's design outweighed any utility or benefit derived from the tractor. At all relevant times, Defendants knew, as the tractor's designer and manufacturer, that the tractor had to be designed and manufactured to minimized risks versus utilities; yet Defendants designed, manufactured, marketed and placed into the stream of commerce a defective and unreasonably dangerous product, thereby exposing people, like Plaintiff, to serious risk of harm.

12.

Defendants' defective tractor was the proximate cause of Plaintiffs' injuries. Therefore, Defendants are strictly liable for all injuries and damage to Plaintiffs.

Count 2 – Negligence

13.

Plaintiffs reallege and incorporate the above allegations as if fully restated herein.

14.

At all relevant times herein, Defendants had a duty of reasonable care to design, manufacture, market, and distribute non-defective products, including the subject tractor, that are reasonably safe for their intended uses.

14.

Defendants breached that duty when they designed, manufactured, tested, marketed, and placed into the stream of commerce a defective and unreasonably dangerous product, the subject tractor, which posed a serious safety hazard to users like Plaintiff MCCLENDON.

15.

Defendants knew, or in the exercise of ordinary care, should have known through their own testing, that the tractor was unreasonably dangerous to those persons likely to use the product for the purpose and in the manner for which it was intended to be used. Despite this knowledge, Defendants marketed and sold the defective tractor, exposing the public and Plaintiffs to an unreasonable risk of harm.

16.

Defendants owed Plaintiff, as well as the public at large, the duty of reasonable care in designing and manufacturing the subject tractor. Defendants failed to act as an ordinary, prudent manufacturer in designing and manufacturing the subject tractor and violated their duties to the public, including Plaintiffs, and were negligent. Defendants' negligence in designing and/or manufacturing the defective tractor were the proximate cause of Plaintiffs' injuries and damages, as described herein.

17.

Defendants are liable for their negligence and for all injuries and damages to Plaintiffs related to this incident.

Count 3 – Damages

18.

Plaintiffs reallege and incorporate the above allegations as if fully restated herein.

19.

Plaintiffs' injuries and damages resulting from Defendants' misconduct were strictly, directly and proximately caused by Defendants.

20.

Plaintiffs were injured and have experienced physical and emotional pain and suffering as a direct and proximate result of Defendants' misconduct.

21.

In the future, it is likely Plaintiffs will continue to have physical injuries and experience physical and emotional pain and suffering as a strict, direct and proximate result of Defendants' misconduct.

22.

In the future, it is likely Plaintiffs will continue to need medical treatment as a strict, direct and proximate result of Defendants' misconduct.

23.

Plaintiffs experienced and will continue to experience pain and suffering as a strict, direct and proximate result of Defendants' misconduct.

24.

As a result of Defendants' misconduct, Plaintiffs have incurred reasonable, necessary, and continuing medical expenses and will continue to incur expenses in the future, in an amount to be proven at trial.

24.

Plaintiffs are entitled to recover for their injuries and the pain and suffering sustained, and all other elements of damages allowed under Georgia law, including but not limited to all compensatory, general, special, incidental, consequential, and/or other damages permitted. Plaintiffs state their intentions to seek all compensatory, special, economic, consequential, general, and all other damages permissible under Georgia Law, including, but not limited to:

- a) Personal injuries;
- b) Past, present and future pain and suffering;
- c) Disability;
- d) Disfigurement;
- e) Mental anguish;
- f) Loss of capacity for the enjoyment of life;
- g) Economic losses;
- h) Incidental expenses;
- i) Past, present and future medical expenses;
- j) Lost earnings;
- k) Loss of consortium;
- l) Loss of earning capacity;
- m) Permanent injuries; and
- n) Consequential damages to be proven at trial.

WHEREFORE, Plaintiffs pray that they have a trial on all issues and judgment against Defendants as follows:

- a) Process issue as provided by law;
- b) Plaintiffs have a trial by jury against Defendants;
- c) Judgment be awarded to Plaintiffs and against Defendants;
- d) That Plaintiffs recover the full value of past and future medical expenses and past and future lost wages in an amount to be proven at trial;
- e) That Plaintiffs recover for physical and mental pain and suffering in an amount to be determined by the enlightened conscience of a jury;
- f) Plaintiffs attorneys' fees and expenses of litigation
- g) Plaintiffs cost of suit;
- h) Plaintiffs pre-judgment and post-judgment interest, as allowed as applicable law
- i) That Plaintiffs recover punitive damages in an amount to be determined by the enlightened conscience of a jury; and
- j) That Plaintiffs recover such other and further relief as is just and proper.

Respectfully submitted on Friday, May 6, 2022

/s/ Ramin Kermani-Nejad
Ramin kermani-Nejad, Esq.
KERMANI FIRM LLC
Georgia Bar No. 669698
Attorney for Plaintiff

KERMANI FIRM LLC
1718 Peachtree Street NW, Suite 489
Atlanta, Georgia 30309
Tel: 678-202-0494

Fax: 678-202-0209
rk@kermanillp.com

AFFIDAVIT OF SERVICE

Case: 22EV002711	Court: IN THE STATE COURT OF FULTON COUNTY STATE OF GEORGIA	County: FULTON	Job: 7268831
Plaintiff / Petitioner: TYHE MCLENDON, et al		Defendant / Respondent: DEERE & COMPANY, et al	
Received by: Michael Rivers		For: Kermani LLP	
To be served upon: DEERE & COMPANY			

I, Michael Rivers, being duly sworn, depose and say: I am over the age of 18 years and not a party to this action, and that within the boundaries of the state where service was effected, I was authorized by law to make service of the documents and informed said person of the contents herein

Recipient Name / Address: DEERE & COMPANY, 106 Colony Park Dr Suite 800-B, Cumming, GA 30040

Manner of Service: Registered Agent, Jun 23, 2022, 11:10 am EDT

Documents: Summons and Complaint for Damages

Additional Comments:

1) Successful Attempt: Jun 23, 2022, 11:10 am EDT at 106 Colony Park Dr Suite 800-B, Cumming, GA 30040 received by DAYVON JACKSON at The Corporation Company for DEERE & COMPANY.

Subscribed and sworn to before me by the affiant who is personally known to me.

Michael Rivers

Date

Michael Rivers
3301 Buckeye Rd Suite 303
Atlanta, GA 30341
404-552-1905

Notary Public

Date

Commission Expires





IN THE STATE COURT OF FULTON COUNTY

STATE OF GEORGIA

Administrative Order No. 22EX000001

IN RE: ORDER FOR APPOINTMENT FOR SERVICE OF PROCESS

It appearing that the State Court of Fulton County has read and considered petitions and criminal records for the persons listed below, and the same having met certification requirements, this Court hereby allows the same to serve process for State Court proceedings.

IT IS HEREBY ORDERED that the following persons:

ABRAHAM, ROBIN L.	FARKAS, BELA	KING, AMOS	SAXON, ROBIN LEE
ALLEN, LAKEITA TYESHA	FAULKNER, DANA V.	KOTLAR, MICHAEL J.	SAXON-FORD, VIRGINIA
ANDERSON, QAISAR CRAIG	FAZZIO, DEDREA L.	LASTER, BEVERLY L.	SEKLECKI, CHRISTIAN G.
ANDERSON, WILLIAM JAMES	FERGUSON, REGINALD B.	LAUSMAN, MARSHA C.	SHEPHERD, ELIZABETH A.
ANDREWS II, GENE EDWARD	FERRERO, AMY LYNN	LAWSON, ZURI M.	SIBBALD, JOHN WILLIAMS
ARMSTRONG, CHRISTOPHER J.	FISHER, DAWN WALLS	LE, PHUONG-ANH DAO	SINGLETON, WESLEY G.
ARMSTRONG, CYNARA	FITZGERALD, FLORETTA	LETTS, WILLIAM EARL	SMITH JR., BRUCE RICHARD
BACKO, MUSTAFA	FOGLE, JOHNNY COLVIN	LEWIS, KEVIN JOSEPH	SMITH, DELACIE PAUL
BAILEY, ANNA MARIE	FOLDS, CATHERINA PILAR	LOUIS, CLYDE A.	SMITH, RONALD LEON
BALL, STACY LEIGH	FOLDS, GEORGE LARRY	LUTWACK, WILLIAM C.	SMITH, VIRGINIA E CHARLES
BARNES, KRISTOPHER KEVIN	FORD, RONNIE	MAGGARD, ANDREW M.	SNELLINGS, SHARON E.
BARNEY JR., STEVEN MICHAEL	FOX, JUHANI ALLEN	MALLAS, NICHOLAS A.	SPEARS, JOYE L.
BARRON, SHANE WILLIS	FREESE, JESSICA RENEE	MAXWELL, BRANDON S.	SPELLEN, ELIZABETH R.
BARRY, PAUL EDWIN	FULLER, THOMAS WAYNE	MCCLELLAN, RODNEY J.	SPELLEN, GEOFFREY B.
BASHAM, JAMES STEVEN	GALVIN, ELIZABETH MARY	MCGAHEE, LARRY LOUIS	STANTON, CHRISTOPHER S.
BENITO, RICHARD DAVID	GARMON, JASON HAMPTON	MCMILLON, ERICKA D.	STARKS, MARC ANTONY
BETHEL-MAXIE, VAQUISHA	GAYLE, EARL WINSTON	MITCHELL, KEVIN JOSEPH	STEPHENS, GERI SHAMEKA
BEYENE, EUAEL BERHANE	GEORGE, RANDAL LEE	MORGAN, TODD VERNELL	STEWART, RONNIE NORRIS
BOATENG, SHERRY DOTSON	GIBBS III, THOMAS DAVID	MOTT, CYNTHIA	STINYARD, KELVIN
BOLLING, KATHERINE DEVORE	GILES, HERBERT F.	MURPHY JR., GREGORY B.	STONE, ALESIA ANDREA
BRAZEMAN, CRAIG PHILIP	GREEN, ANJENAI G.	MURRAH, JUANQUALO D.	STONE, RODNEY DAVID
BRIDGET, KAYLA DENISE	GREEN, MELBA JANI	NEWSOM, JESSICA FALLON	SWINDLE, FRANK L.
BRILEY, DONNIE CHAPPELLE	GREENWAY, KIMBERLY B.	NICHOLS, JEAN GRINWIS	SWINGER, INA LYNN
BRYANT, SHEMAKA ROCHELLE	GRIMSHAW, SHANE KELLE	NICHOLS, LATHAN OTTO	TASSAW, BERHANE BEYENE
BUNCH, KIM	HABTEMARIAM, NEBYOU	NOLEN, MILTON LEE	THOMAS, JEFFREY ALAN
BUTTS, KIMBERLY LYNN	HANDLEY, WILEY D.	O'LEARY, CHRISTINE L.	THOMPSON, VANESSA
BYER, EDMOND JOHN	HARRIS, PARKS WAYNE	PALMER, ALITA SHARISSE	THRASH, NANCY M.
CABRERA-ANDERSON, SANDY	HASSAN, MUHSIN SHAHID	PANNELL, NICOLE D.	TORT, HENRY
CHASTAIN, MICHAEL ALAN	HASSAN, MUHSIN SHAHID	PARKER, ATARI LARAE	TROY, DOUGLAS ADAM
CHESLER, ROSETTA L.	HIGHSMITH, AMOS MATTHEW	PERLSON, MARC DAMON	TURNER, TRAVIS DAVON
CHILDRESS, CLIFTON	HIGHTOWER, ANTHONIO	PHELAN, CHRISTINE	VELASQUEZ, JULIUS O.
CLEMMONS, JOYCE YVONNE	HILL, HOLLIS JEROME	PHELAN, ROSS	WALKER WHISBY, KATARA
CLINE, TRAVIS DANIEL	HILL, LISA WILSON	RANSOME, MAURICE L.	WASHINGTON, SABRINA A.
COCHRANE, BABETTE DAWN	HINDSMAN, CHERROD TER-RAY	RECKERDREES, THOMAS NMN	WATT II, ROOSEVELT
COOK, CHRIS LAMAR	HINES, JAMES WILLIAM	REDDICK, DEREK LAMAR	WEBBER, MELINA MARY
CUNNINGHAM, SALLY K.	HORTON, CHRISTOPHER TODD	REYES, REAGAN J.	WEEKS, FRANCES MARJAN
DALMAN, JONATHAN B.	HORTON, MALACHI	RHODES, KATHRYN DENISE	WEST, ERIC NOEL
DAMBACH-CIRKO, PATRICIA J.	HUDSON, HAKIMAH B.	RICHARDSON, CLARK	WILLIAMS, JACK LELAND
DANIELS, SONIA L.	HUDSON, KYLE W.	RICHARDSON, LEROY	WINKLEMAN, NAN L.
DAVIDSON, DANNY DOUGLAS	HUGULEY, CK ADONNI	RIVERS, MICHAEL THOMAS	WOLFE, LISA LYNN
DAVIDSON, MITCHELL T.	HUMPHREY, JOVIERA Y.	ROBBINS, KAREN FELICIA	WRIGHT, CHRISTOPHER K.
DAY, DUANE DAVIDSON	IRVINE, XAVIER ANTOINE	ROBINSON, JEROY	
DEVAUGHN, CARL LINTON	JACKSON II, ANTHONY	RUDDOCK, LEOPOLD ERIC	
DOLBIER, JEFFREY ALAN	JAMES, FRANK HUGH	RUDDOCK, MARGARET A.	
EARTHRISE, ROCHELLE D.	JENKINS, STEPHANIE D.	SADLER JR., JOHN THURSTON	
ECHOLS, ERIC DWIGHT	JOHNSON, EARL CHARLES	SANDERS, SHAKILLA TERIA	
ECHOLS, PATRICIA IZETTA	JOHNSON, MICHAEL TODD	SAXON, JASMINE NICHOLE	
ELLIOTT, MAURICE	KAHSSU, HAILE TANKEY	SAXON, RASHAD LAMAR	

be appointed and authorized to serve as Permanent Process Servers for the calendar year of 2022, without the necessity of an order for appointment in each individual case.

SO ORDERED, this 1st day of January, 2022.

Susan E. Edlein

Chief Judge Susan E. Edlein
State Court of Fulton County

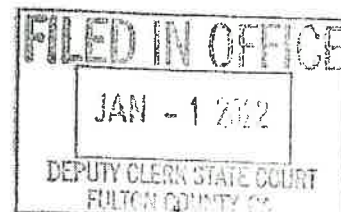


EXHIBIT B

**IN THE STATE COURT OF FULTON COUNTY
STATE OF GEORGIA**

TYHE MCCLENDON and KIANNA LEE,)	
)	
Plaintiffs,)	
)	
vs.)	CIVIL ACTION FILE
)	NO: 22EV002711
DEERE & COMPANY and JOHN/JANE)	
DOES 1-20, inclusive,)	
)	
Defendants.)	
)	

**DEFENDANT DEERE & COMPANY'S
NOTICE OF FILING NOTICE OF REMOVAL**

PLEASE TAKE NOTICE that Defendant Deere & Company (“Deere”), by and through the undersigned, filed in the United States District Court for the Northern District of Georgia, Atlanta Division (the “Federal Court”) a Notice of Removal, a true and correct copy of which is attached as Exhibit “A”, thereby removing this case to Federal Court. Accordingly, the jurisdiction of this Court is hereby suspended and any proceedings in this Court after the date of removal are null and void unless or until the Federal Court remands this matter to this Court. *See, e.g., Cotton v. Federal Land Bank of Columbia*, 246 Ga. 188, 269 (1980).

Respectfully submitted this 21st day of July, 2022.

WEINBERG, WHEELER, HUDGINS,
GUNN & DIAL, LLC

/s/ Carol P. Michel

Carol P. Michel
Georgia Bar No. 504056
Shubhra R. Mashelkar
Georgia Bar No. 475388
Counsel for Defendant Deere & Company

3344 Peachtree Road NE
Suite 2400
Atlanta, GA 30326
Telephone: (404) 876-2700
Facsimile: (404) 875-9433
cmichel@wwhgd.com
smashelkar@wwhgd.com

CERTIFICATE OF SERVICE

This is to certify that I have this day filed a true and correct copy of **DEERE & COMPANY'S NOTICE OF FILING NOTICE OF REMOVAL** with the Court via the Clerk's electronic filing system, which will automatically send notification to all counsel of record, as follows:

Ramin Kermani-Nejad
Hani Ganji
Kermani Firm, LLC
1718 Peachtree St NW
Suite 489
Atlanta, GA 30309
Counsel for Plaintiffs

This 21st day of July, 2022.

WEINBERG, WHEELER, HUDGINS,
GUNN & DIAL, LLC

/s/ Carol P. Michel

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